

the Sravanapudi reference teaches substantially all of the claimed subject matter, for example, of claim 1. However, Applicants respectfully submit that the cited reference appears to lack the teaching of several limitations. For example, the claim requires analyzing fetched modality specific instructions for at least one modality associated with a first user agent program to determine if the modality specific instructions include a concurrent multimodal tag (CMMT). The claim requires that if detected, there is provided modality specific instructions for a second user agent program operating on a different modality, based on the concurrent multimodal tag. As such, Applicants claim, for example, a system that provides concurrent multimodal communication such as concurrent output of information in two different modalities at the same time. This is accomplished, for example, through two different user agent programs, each operating in a different modality. However, the cited portion of the Sravanapudi reference fails to teach, among other things, first and second agent programs that operate in concurrent multimodal operation and as such, the claims are in condition for allowance.

In addition, the office action admits that the Sravanapudi reference does not teach, among other things, the analysis and use of concurrent multimodal tags to provide modality specific instructions for a second user agent program that is operating in a different modality using the concurrent multimodal tags. However, the Luther reference is cited for teaching such an operation and tag.

However, the Luther reference does not appear to be directed to concurrent multimodal communication at all. Luther is directed to a method and apparatus for scripting a text-to-speech based multimedia presentation. The multimedia scripting commands are executed so as to cause file access of different stored files such as still videos, motion video images, animated images or other information. The cited portion of Luther, namely column 8, lines 20-30 uses the word “tags” but are not referring to the claimed concurrent multimodal tag as Applicants set forth in

their claims. In contrast, the tags in the Luther reference in no way appear to refer to any concurrent multimodal tag. In other words, neither Luther nor the Sravanapudi reference teach concurrent multimodal outputs, for example, in the two different user agent programs nor the use of a concurrent multimodal tag. The “tag name” in the Luther reference is merely a name apparently used to transfer control to a different portion of the scripting commands for text-to-speech based multimedia presentations of Luther. Accordingly, the claim is in condition for allowance.

Even for arguments sake, even if the teachings of these references were combined, the combination would simply result in a text-to-speech based mechanism for multimedia presentation that used a tag to identify captioning within an image rectangle, for example, and provide flow controls for the multimedia presentation. Accordingly, Applicants respectfully submit that the claim is in condition for allowance.

As to claim 2, which depends on claim 1, the office action appears to be similarly contradictory. For example, the office action admits that the Sravanapudi reference does not teach the concurrent multimodal tags as claimed and cites Luther as allegedly teaching such tags and their use as claimed. As noted above, Luther does not teach such an operation. In any event, as to claim 2, the office action instead cites the Sravanapudi reference as allegedly teaching “concurrent multimodal tag” citing paragraphs 34, 36, 51-54 and 59. However, Applicants are unable to find any mention of a concurrent multimodal tag as claimed in the cited portions and as such, this claim is also in condition for allowance.

The other dependent claims add additional novel and non-obvious subject matter and are also allowable. For example, claim 4 also requires that the data that identifies modality specific instructions for the different modalities of the different user agent programs include a concurrent multimodal tag embedded in the base markup language form. However, as noted above, for

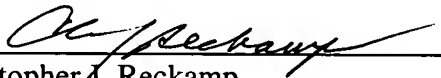
example with respect to claim 2, the office action admits that Sravanapudi fails to teach concurrent multimodal tags. Accordingly, the claim is in condition for allowance. In addition, the cited portion, namely paragraphs 56-57 do not describe concurrent multimodal tags embedded in base markup language forms but instead refers to web pages where requested web content is located that may be necessary to, or relevant for, performing a service such as a voice enabled internet service. Accordingly, Applicants respectfully submit that this claim is also in condition for allowance.

As per claim 6, Applicants respectfully submit the relevant remarks made above with respect to claim 1 noting that neither of the references describe, for example, concurrent multimodal tags and providing multimodal specific instructions for first and second user agent programs operating in different modalities based on the concurrent multimodal tag. Accordingly, this claim is also in condition for allowance.

Applicants respectfully submit that the claims are in condition for allowance and respectfully request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

Dated: 8/25/05

By:   
Christopher J. Reckamp  
Reg. No. 34,414

Vedder, Price, Kaufman & Kammholz, P.C.  
222 North LaSalle Street  
Chicago, Illinois 60601  
PHONE: (312) 609-7599  
FAX: (312) 609-5005